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Attorney for Movants Yu and Snow

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONALD RAMSEY, Individually and on)
 Behalf of All Others Similarly Situated,)
)
 Plaintiff,)
)
 vs.)
)
 COINBASE GLOBAL, INC., et al.,)
)
 Defendants.)

Case No.: 3:21-cv-05634-VC
**NOTICE OF WITHDRAWAL OF
 COINBASE INVESTOR GROUP LEAD
 PLAINTIFF MOTION**
 CLASS ACTION
 Judge: Vince Chhabria
 Hearing Date: October 28, 2021
 Time: 2:00 pm
 Ctrm: Courtroom 4, 17th Floor

GABBY KLEIN, Individually and on)
 Behalf of All Others Similarly Situated)
)
 Plaintiff,)
)
 v.)
 COINBASE GLOBAL, INC., et al.,)
)
 Defendants.)

Case No.: 3:21-cv-06049

MATTHEW CATTERLIN, Individually and on)
 Behalf of All Others Similarly Situated)
)
 Plaintiff,)
)
 v.)
 COINBASE GLOBAL, INC., et al.,)
)
 Defendants.)

Case No.: 3:21-cv-06149

**NOTICE OF WITHDRAWAL OF
COINBASE INVESTOR GROUP LEAD PLAINTIFF MOTION**

On September 20, 2021, Coinbase Global Inc. stockholders Hsiu-Mei Yu (“Movant Hu”) and Minorka Snow (“Movant Snow,” together with Movant Yu, the “Coinbase Investor Group”) filed a Notice of Motion and Motion of Coinbase Investor Group for Consolidation or Related Actions, Appointment as Lead Plaintiffs, and Approval of Co-Lead Counsel (the “Coinbase Investor Group Motion”)(Dkt. No. 39) seeking, among other things, to be appointed lead plaintiff (“Lead Plaintiff”) in the captioned class actions (the “Related Actions”) pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”).

Also on September 20, 2021, Movant Yu filed a separate Motion for (1) Consolidation of the Related Actions; (2) Appointment as Lead Plaintiff; and (3) Approval of Selection of Counsel in association with different counsel, seeking, among other things, appointment as Lead Plaintiff in the Related Actions pursuant to the PSLRA (the “Yu Motion”)(Dkt. No. 17).

In light of the foregoing, Movant Yu wishes to withdraw from the Coinbase Investor Group Motion (Dkt. No. 39). It is the understanding of the undersigned that Movant Yu will continue with the Yu Motion (Dkt. No. 17) and continue to seek the relief sought therein, including appointment as Lead Plaintiff in the Related Actions.

Although Movant Snow remains willing to serve as Lead Plaintiff in the Related Actions, it is apparent her comparative financial interest alone would be insufficient to render her the presumptive lead plaintiff. As a result, Movant Snow wishes to discontinue Coinbase Investor Group Motion in its entirety.

WHEREFORE, based upon the foregoing, Movant Yu hereby notifies the Court that she is withdrawing from the Coinbase Investor Group Motion and, as a result, Movant Snow is withdrawing the Coinbase Investor Group Motion in its entirety. (Dkt. No. 39).

1 Dated: September 27, 2021

Respectfully, submitted,

2 **WEISSLAU LLP**

3 /s/ Joel E. Elkins

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7 (Pro Hac to be filed)

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9
10 *Attorneys for Movants Yu and Snow*

Attorney for Movants Yu and Snow

PROOF OF SERVICE

I, Joel E. Elkins, hereby declare under penalty of perjury as follows:

I am a member of the law firm of WeissLaw LLP, with offices at 9100 Wilshire Blvd. #725 E., Beverly Hills, CA 90210. I am over the age of eighteen.

On September 27, 2021, I electronically filed the following **NOTICE OF WITHDRAWAL OF COINBASE INVESTOR GROUP LEAD PLAINTIFF MOTION** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

I certify under penalty of perjury under the laws of the United States of America that the foregoing in true and correct.

Executed on September 27, 2021

/s/ Joel E. Elkins
Joel E. Elkins